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FILED IN THE U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

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SEAN F. McAVOY, CLERK
SPOKANE, WASHINGTON

9 UNITED STATES DISTRICT COURT
10 FOR THE EASTERN DISTRICT OF WASHINGTON

11 UNITED STATES OF AMERICA,

Case No.: 2:24-CR-28-MKD

12 Plaintiff,

INDICTMENT

13 v.

Vios: 18 U.S.C. §§ 2243(a), 1153
Sexual Abuse of a Minor in
Indian Country
(Count 1)

14 LANCE SCOTT MICHEL,

15 Defendant.

16 18 U.S.C. §§ 1591(a)(1),
17 (b)(2), 1153
18 Child Sex Trafficking in
19 Indian Country
(Counts 2, 4)

20 18 U.S.C. §§ 2241(a)(1), (c),
21 1153
22 Aggravated Sexual Abuse of a
23 Minor in Indian Country
(Count 3)

24 18 U.S.C. §§ 2253, 1594
25 Forfeiture Allegation

26
27 The Grand Jury charges:
28

COUNT 1

Between on or about May 1, 2023, and May 31, 2023, in the Eastern District of Washington, within the external boundaries of the Confederated Tribes of the Colville Reservation, in Indian Country, the Defendant, LANCE SCOTT MICHEL, an Indian, did knowingly engage and attempt to engage in a sexual act with MINOR 1, a person who had attained the age of 12 years but had not attained the age of 16 years and was at least four years younger than LANCE SCOTT MICHEL, all in violation of 18 U.S.C. §§ 2243(a), 1153.

COUNT 2

Between on or about May 1, 2023, and on or about May 31, 2023, in the Eastern District of Washington, within the external boundaries of the Confederated Tribes of the Colville Reservation, in Indian Country, the Defendant, LANCE SCOTT MICHEL, an Indian, did knowingly recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means a person, MINOR 1, knowing and in reckless disregard of the fact, and having had a reasonable opportunity to observe MINOR 1, that MINOR 1 had not attained the age of 18 years and would be caused to engage in a commercial sex act, in violation of 18 U.S.C. §§ 1591(a)(1), (b)(2), 1153.

COUNT 3

Between on or about May 1, 2023, and July 31, 2023, in the Eastern District of Washington, within the external boundaries of the Confederated Tribes of the Colville Reservation, in Indian Country, the Defendant, LANCE SCOTT MICHEL, an Indian, did knowingly engage in a sexual act with MINOR 2, a person who had attained the age of 12 years but had not attained the age of 16 years and was at least four years younger than LANCE SCOTT MICHEL, by

1 using force against MINOR 2, all in violation of 18 U.S.C. §§ 2241(a)(1), (c),
2 1153.

3
4 COUNT 4

5 Between on or about May 1, 2023, and on or about July 31, 2023, in the
6 Eastern District of Washington, within the external boundaries of the Confederated
7 Tribes of the Colville Reservation, in Indian Country, the Defendant, LANCE
8 SCOTT MICHEL, an Indian, did knowingly recruit, entice, harbor, transport,
9 provide, obtain, advertise, maintain, patronize, and solicit by any means a person,
10 MINOR 2, knowing and in reckless disregard of the fact, and having had a
11 reasonable opportunity to observe MINOR 2, that MINOR 2 had not attained the
12 age of 18 years and would be caused to engage in a commercial sex act, in
13 violation of 18 U.S.C. §§ 1591(a)(1), (b)(2), 1153.

14 NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

15 The allegations set forth in this Indictment are hereby realleged and
16 incorporated by reference for the purpose of alleging forfeitures.

17 Pursuant to 18 U.S.C. § 2253, upon convicted of an offense in violation of
18 18 U.S.C. § 2243 or 2241 as set forth in Counts 1 and 3 of this Indictment, the
19 Defendant, LANCE SCOTT MICHEL, shall forfeit to the United States any visual
20 depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of this
21 chapter, or any book, magazine, periodical, film, videotape, or other matter which
22 contains any such visual depiction, which was produced, transported, mailed,
23 shipped or received in violation of this chapter; any property, real or personal,
24 constituting or traceable to gross profits or other proceeds obtained from such
25 offenses; and any property, real or personal, used or intended to be used to commit
26 or to promote the commission of such offenses, or any property traceable to such
27 property.
28

1 If any such property, as a result of any act or omission of the Defendant:

- 2 a. cannot be located upon the exercise of due diligence;
3 b. has been transferred or sold to, or deposited with, a third party;
4 c. has been placed beyond the jurisdiction of the Court;
5 d. has been substantially diminished in value; or
6 e. has been commingled with other property which cannot be divided
7 without difficulty,

8 the United States shall be entitled to forfeiture of substitute property pursuant to
9 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b).

10 Pursuant to 18 U.S.C. § 1594, upon conviction of an offense in violation of
11 18 U.S.C. § 1591, as set forth in Counts 2 and 4 of this Indictment, the Defendant,
12 LANCE SCOTT MICHEL, shall forfeit to the United States of America any
13 property, real or personal, involved in, used, or intended to be used to commit or to
14 facilitate the commission of the offenses, and any property traceable to such
15 property; and any property, real or personal, constituting or derived from, any
16 proceeds obtained, directly or indirectly, as a result of the offenses, and any
17 property traceable to such property.


18 If any of the property described above, as a result of any act or omission of
19 the Defendant
20

- 21 a. cannot be located upon the exercise of due diligence;
22 b. has been transferred or sold to, or deposited with, a third party;
23 c. has been placed beyond the jurisdiction of the court;
24 d. has been substantially diminished in value; or
25 e. has been commingled with other property which cannot be
26 divided without difficulty,
27
28

1 the United States of America shall be entitled to forfeiture of substitute
2 property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C.
3 § 2461(c).

4 DATED this 21 day of February 2024.

5
6 A TRUE BILL

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9 
10 Vanessa Waldref

11 Vanessa R. Waldref
12 United States Attorney

13 Michael J. Ellis

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